

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MARY L. WHITE,	)	
	)	
Plaintiff,	)	Civil Action No. 00-CV-2466
vs.	)	
	)	Magistrate Judge Amy R. Hay
SHAYEN A. GEORGE, M.A.,	)	
	)	
Defendant.	)	

**AMENDED COMPLAINT**

AND NOW, comes Plaintiff, Mary L. White, by and through the undersigned attorneys, and incorporates the Complaint filed on or about December 19, 2000, ("Complaint"), as if the same were more fully set forth herein at length, said Complaint is amended as follows:

91A. On or about March 15, 2005, White learned for the first time that at the same time that George opened the secret account referenced in Paragraphs 88 - 91 of the Complaint, he also opened a second secret account in the name of ACCG.

91B. White did not have access to this second secret (ACCG) account as she had to the ACCG accounts prior to George's actions.

91C. George did not have authority to open this second secret (ACCG) account.

91D. It is believed that after the fraudulent accounts were opened, George deposited and withdrew corporate money without White's knowledge.

# EXHIBIT 1

92D. It is believed that these withdrawals and deposits occurred during 1999 and through 2000, when White was Administrative Director of ACCG and she had a right and was entitled to see such financial information.

93E. George has refused and continues to refuse to permit White access to the accounts and/or information concerning the accounts.

Respectfully submitted,

FELDSTEIN, GRINBERG, STEIN & McKEE

By: \_\_\_\_\_  
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# EXHIBIT 1

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the attached ***Amended Complaint*** was served on August \_\_\_\_, 2005, via first class United States mail, postage prepaid, upon the following:

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By: \_\_\_\_\_

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**EXHIBIT 1**